

AFFIDAVIT OF K.M.

STATE OF NEW YORK ) ss:s.

COUNTY OF ROCKLAND )

K.M., an adult of legal age, hereby states under pains and penalties of perjury:

1. I am one of the plaintiffs in this matter and make this statement to my personal knowledge.

2. I was drawn to Waldorf Education after first learning of the philosophy when my eldest son was reaching Kindergarten-age. I moved to Minnesota in 2010, where there were 3 Waldorf school options for early childhood and kindergarten. I enrolled my sons, then 5 and 3, in Spring Hill Waldorf school in Excelsior, MN in the fall of 2010, and chose to reside close by. Since then, and now with 4 sons ages 13, 12, 8 and 4, I have been absolutely committed to providing them a Waldorf education.

3. For those with less experience with its background, Waldorf strives to create a social, cultural, and learning environment that recognizes the child's spiritual freedom and growth. Inspired by Rudolf Steiner's insights into human development, Waldorf nurtures the physical, emotional, and intellectual capacities of the growing child through a developmentally appropriate curriculum. It has been and is an academically challenging, yet highly engaging and deeply-rooted part of my sons' lives, each of them having grown-up in a Waldorf environment since early childhood.

4. We moved back to New York in the spring of 2013, seeking to continue my sons' education in a Waldorf curriculum. There are several options for those seeking Waldorf in the New York-area, but the school with the longest experience and best reputation, not to mention the most comparatively attractive value proposition given its tuition as a private school, is Green Meadow Waldorf School in Chestnut Ridge. I moved to Rockland County and bought a house near the school specifically for my sons to attend Green Meadow Waldorf School and for my family to join its long-standing community.

5. I have found Rockland County to be an engaging place – it is both socio-economically and culturally diverse. Within the sphere of the county, the school has been at our center. For my sons, it is the center of their educational, social and active lives. For me, it is my source of community, friendships and support. So it was with nothing short of shock that I first learned my sons would be excluded (and by extension myself) from the very fabric of our lives without warning and with not one student ill on the campus or within remotely reasonable proximity to Green Meadow from measles.

6. To call the actions of the county's Department of Health since the outset of the measles outbreak ham-fisted would be appropriate if not for the very real and incredibly detrimental impact it has had on our lives. At this point, I believe the county has acted maliciously. My children have been in turns confused, angry and despondent. As a parent, exercising my right to freely practice my religion, and complying within my rights within the State of NY, it is heartbreaking and frustrating to be faced with such an impossible dilemma. I have a religious exemption because of my sincerely-held religious beliefs, but it has meant nothing against this exercise of irrational state power.

7. To add insult to injury, managing through the shifting whims of officials' dictates that have moved timeframes, rationale and scope with such callous disregard for the damage they are causing is galling and frankly surreal. I do not believe that even a well-intentioned bureaucracy should lead those they are entitled to protect and to serve into a state of helplessness.

8. The county lacks precedent and logical rationale for this exclusion. I ask the court to please act on my behalf accordingly and allow my children to return to school immediately.

  
K.M.

Signed and sworn to before me this \_\_\_ day of March 2019.

~~NOTARY PUBLIC~~

My commission expires:

MICHAEL HOWARD SUSSMAN  
Notary Public, State of New York  
No. 02SU6332584  
Qualified in Orange County  
Commission Expires Nov. 09, 2019